

# A02-0061 07-21-03

# **Application Form**

Pfizer Pharmaceuticals LLC
Name of facility*
·
Pfizer Inc.
Name of parent company (if any)
Road 2, Km 58.2
Street address
P.O. Box 628
Street address (continued)
Barceloneta, Puerto Rico 00617
City/State/Zip code

Give us information about your contact person for the National Environmental Performance Track Program.

Name	Mr. Carlos Lopez	
Title	Environmental and Safety Services Director/ Team Leader	
Phone	787 774-7419	
Fax	(787) 846-7310	
E-mail	carlos.lopez@pfizer.com	
Company Website www.pfizer.com		

<sup>\*</sup> If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

# Why do we need this information?

EPA needs background information on your facility to evaluate your application.

## What do you need to do?

Provide background information on your facility.

pages 32-38 of the instructions and enclose it with your

Identify your environmental requirements.

Section	A
Tell us about your facility.	

2	What do you do or make at your facility?  List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	The facility manufactures pharmaceuticals products including tablets and capsules. The pharmaceutical active ingredients that are present in the products are synthesized on-site in multi-step chemical processes. Following synthesis, these active ingredients are milled to produce particles of optimum size, and blended with materials such as sucrose and cellulose, and either compressed to form tablets or added to capsules. The tablets and capsules are packaged for delivery to the pharmacy and patient.  NAICS 3254
3	Does your company meet the Small Business Administration definition of a small business for your sector?	☐ Yes
4	How many employees (full-time equivalents) currently	☐ Fewer than 50
	work at your facility? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.	□ 50-99
		□ 100-499
		☐ 500-1,000
		☑ More than 1,000
5	Complete the Environmental Requirements Checklist on	

application.

# Section A, continued

Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level? Pfizer's goal is to have the best environmental and health and safety performance in the pharmaceutical industry. Toward this end, Pfizer colleagues at the Barceloneta facility are working to improve the facility's environmental performance by, for example, reducing the facility's emissions to the air, its wastewater discharges, the quantity of water used and wastes that are generated in its operations.

Showing overall reductions in the performance indicators, e.g., the quantity of waste generated at the facility, is difficult, even if the reductions are normalized, for two reasons. First, significant reductions have already been achieved by past efforts of Pfizer colleagues. Accordingly, the types of improvements that can be practically implemented will yield relatively small reductions. Furthermore, because the facility completes up to 14 different chemical synthesis steps and produces 34 major product formulations, each different from a environmental performance perspective, e.g., quantity of waste per kilogram of product, there is no simple normalizing factor, such as production volume, to reflect increases and decreases of production of particular products

Because major improvements in performance have already been achieved and because there are often no simple normalizing factors, some of our commitments are specifically for a particular waste stream or for a particular process, e.g., we propose to reduce the quantity of a particular type of waste that is land filled instead of proposing a reduction in the total quantity of waste that is land filled. This is necessitated by the nature of the operations at the Barceloneta facility.

One of Pfizer's core values is to play an active role, as an organization, and as individuals, to make the community that we work in a better place to live and work. We lend support to the community's recycling efforts and to the local school system. We have invited members of the community to participate in facility programs to increase their environmental awareness.

We are fervent about our environmental responsibility and about the health and safety of the colleagues who work at the facility.

## Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

## What do you need to do?

- Confirm that your EMS meets the Performance Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



Tell us about your EMS.

Read the EMS requirements on page 9-12 of instructions. Tell us if your EMS meets these requirements for:

1	Environmental policy ————————————————————————————————————	△ Yes	□ NO
2	Planning —————	⊠ Yes	☐ No
3	Implementing and operation	⊠ Yes	☐ No
4	Checking and corrective action ————————————————————————————————————	⊠ Yes	☐ No
5	Management review	⊠ Yes	☐ No
6	Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?)	⊠ Yes	□ No
7	Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?)	⊠ Yes	□ No
8	When did you last update your aspect analysis? (mo/yr)	April 200	3
9	Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Yes	□ No
10	Did this cycle include both an EMS and a compliance audit?	⊠ Yes	□ No
11	Have you completed an objective self-assessment or third-party assessment of your EMS?	⊠ Yes	□ No

OMB No. 2010-0032

### Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

### What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



Part 1 You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions. Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

**Note to small facilities:** If you are a small facility, you must report past achievements for only one environmental aspect.

#### First achievement

1 What aspect have you selected from the Table on page 29-31?	Discharges of Toxics to Water	
What units are you using to quantify this aspect? (See Table, page 29-31.)	Tons	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	1.693	0.005
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.85	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production levels in Chemical Synthesis	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	The discharges of methylene chloride and toluene, the prinicpal toxic materials in the facility's wastewaters were reduced by upgrading the facility's wastewater treatment system (a steam stripping process).	

# Section C, continued

#### Second achievement

What aspect have you selected from the Table on page 29-31?	Emissions of Volatile Organic Compounds	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Tons	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	50.6	46.8
4 What are the years for which you are reporting these quantities?	2000	2002
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production Level in Chemical Synthesis	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	The emissions of volatile organic compounds (VOCs) were reduced by connecting the vents of tanks storing VOCs to an air pollution control system. It is noted that VOCs are emitted from storage tanks while the tanks are being filled and also when vapor is displaced due to temperature changes caused by solar heating during the daytime.	

Part 2 You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

**Note to small facilities:** If you are a small facility, you must report future commitments for only two environmental aspects.

# Section C, continued

# First commitment

1	What aspect have you selected from the Table on pages 29-31?	Total Materials Use		
2	What units are you using to quantify this aspect?	Tons		
<i>3a</i>	Is this aspect considered significant in your EMS?	⊠ Yes □ No		
<i>3b</i>	If no, please explain why you believe this aspect should be included as a performance commitment.			
		CURRENT	FUTURE	
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	8,306	5,409	
5	What are the years for which you are reporting these quantities?	2002	2005	
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	0.955	
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production level of a pharmaceutical active ingredient		
7	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We will change a reactant in a process that is used to synthesize a pharmaceutical active ingredient. This change will significantly increase the yield of chemical process thereby reducing the quantity of materials required to produce the active ingredient. This change will also reduce VOC emissions to the atmosphere, the quantity of hazardous waste, and the quantity of BOD in the wastewater discharged from this particular process. This commitment reflects the reduction of materials used in a particular process not a total reduction in materials used at the facility.		
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	⊠ Yes □ No		
8b	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	Because this is a change to the production of an active pharmaceutical ingredient, we are subject to FDA requirements related primarily to the quality concerns.		

# Section C, continued

# Second commitment

1	What aspect have you selected from the Table on pages 29-31?	Total Water Use	
2	What units are you using to quantify this aspect?	Gallons	
<i>3a</i>	Is this aspect considered significant in your EMS?	⊠ Yes □ No	
<i>3b</i>	If no, please explain why you believe this aspect should be included as a performance commitment.		
		CURRENT	FUTURE
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	120,794,000	117,942,800
5	What are the years for which you are reporting these quantities?	2002	2005
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.00
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	The overall factor is based upon a combination of several factors including: production levels in organic s ynthesis and in pharmaceutical production areas, the facilities demand for utilities such cooling (tons), steam production, the area being irrigated, and head count, that is, the number of colleagues and contract personnel.	
7	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We plan to replace two aqueous scrubbers which remove particulate materials emitted from a pharmaceuticals production step with a baghouse (no water usage). This change will also reduce particulate emissions and the volume of wastewater discharged from the process.	
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	⊠ Yes □ No	
8b	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	The scrubbers are emissions units regulated by the facility's permit. While we have to upgrade the performance of the scrubbers to achieve 95 % removal of particulates, the proposed commitment exceeds the regulatory requirement (99 % removal of particulates). In addition to improved performance, the bag house will require less maintenance and of course, will eliminate water usage from this process.	

# Section C, continued

# Third commitment

1	What aspect have you selected from the Table on pages 29-31?	Hazardous Solid Waste		
2	What units are you using to quantify this aspect?	Tons		
<i>3a</i>	Is this aspect considered significant in your EMS?	⊠ Yes □ No		
<i>3b</i>	If no, please explain why you believe this aspect should be included as a performance commitment.			
		CURRENT	FUTURE	
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	10,688	10,245	
5	What are the years for which you are reporting these quantities?	2002	2005	
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.00	
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production levels of the intermediates and products which generate the hazardous wastes		
	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We plan to treat certain spent solvent waste streams so these streams can be sold as commercial chemical products instead of the current practice of disposing them as hazardous wastes. We also plan to continue to evaluate and where practical make improvements to our production and waste treatment processes to reduce the quantity of hazardous waste that is generated.		
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	⊠ Yes □ No		
8b	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	While we have a Part B permit to store and treat hazardous wastes, we are not required to achieve specific reductions in the volume of hazardous waste to comply with a specific permit condition. It is noted that our RCRA permit does require that we have a waste minimization plan.		

# Section C, continued

# Fourth commitment

1	What aspect have you selected from the Table on pages 29-31?	Total Solid Waste	
2	What units are you using to quantify this aspect?	Tons	
<i>3a</i>	Is this aspect considered significant in your EMS?	⊠ Yes □ No	
<i>3b</i>	If no, please explain why you believe this aspect should be included as a performance commitment.		
		CURRENT	FUTURE
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	50	15
5	What are the years for which you are reporting these quantities?	2002	2005
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.0
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Number of visitors and contractors entering the pharmaceutical production area	
7	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We are planning to recycle disposable garments that are used by visitors and contractors that enter the pharmaceutical production areas. The disposable garments are currently being disposed as a solid waste in a landfill. The proposed commitment is to reduce the quantity of disposable garments that are landfilled not to reduce to the total quantity of the waste landfilled by the facility.	
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	☐ Yes ☒ No	
8b	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.		

#### Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

## What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

# Section D

Tell us about your public outreach and reporting.

1	How do	you identify	and resp	ond to co	mmunity	concerns'

There is an open an ongoing dialogue between PPLLC and the local community on issues of common concern, e.g., the community might inquire about the facility's capital spending plan, as this is a source of revenue (taxes) to the community. The community knows the point of contact at Pfizer.

There is a written procedure to address complaints from community. If there is a complaint from the community, it is first directed to the Human Resources Department, which forwards the complaint to the appropriate department within the facility for review and feedback. After the issue is discussed between both departments, the Human Resources Department responds to the person making complaint.

Pfizer's Corporate EHS Policy requires that we maintain an open dialogue with the community to understand and remain sensitive to its EHS expectations. Pfizer makes its EHS Policy available to the public.

2 How do you inform community members of important matters that affect them?

As indicated, Pfizer has an open dialogue with the community. The main communication is via telephone and face-to-face contact with local representatives. The public is also notified via newspaper on certain sized capital projects.

3 How will you make the Performance Track Annual Performance Report available to the public?

☑ Website To be determined☐ Newspaper☐ Open Houses☑ Other

We will prepare a newsletter describing our progress toward meeting our commitments. The newsletter will be distributed to leaders of the local community who would distribute the information to the community. The newsletter would also be distributed to the members of the local community that use a walking trail on the Barceloneta facility's property.

# Section D, continued

4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ No	
	If yes, describe briefly in the right-hand column.			

## 5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Tiburones School System	Mrs. Caceres School Principal	(787) 846-4379
State/tribal/local regulator	Environmental Quality Board	Mr. Israel Torres  RCRA Section Director	(787) 767-8181
Other community/local reference (e.g., emergency management official or business associate)	Merck Inc.  Manager of Environmental Affairs	Diana Cabrera	diana_cabrera@merck.com Telephone number (787) 623-6002



On behalf of Pfizer Pharmaceuticals LLC Barceloneta facility,

- I certify that I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, as specified in the National Environmental Performance Track Program Guide and in the Application Instructions;
- I have personally examined and am familiar with the information contained in this Application, including the Environmental Requirements Checklist. The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS
  requirements, including systems to maintain compliance with all applicable Federal, State, tribal, and local
  environmental requirements in place at the facility, and the EMS will be maintained for the duration of the
  facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all Federal, State, tribal, and local
  environmental requirements, and the facility has corrected all identified instances of potential or actual
  noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable Federal, State, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date	
Printed Name/Title	Mr. Louis Prado / General Manager .
Phone Number/E-mail	787 846 4300 x 2000
Facility Name	Pfizer Pharmaceuticals LLC
Facility Street Address	Route 2, Km 58.2, P.O Box 628
City/State/Zip Code	Barceloneta, PR 00617

30/03

# Environmental Requirements Checklist

Use the Environmental Requirements Checklist to answer Question 5 in *Section A, Tell us about your facility*. This Checklist will help you identify the *major* Federal, State, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

Fill in your facility information below and enclose the completed Checklist with your application.

## Air Pollution Regulations

Check all that apply

$\boxtimes$	1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
$\boxtimes$	2.	Permits and Registration of Air Pollution Sources
$\boxtimes$	3.	General Emission Standards, Prohibitions, and Restrictions
	4.	Control of Incinerators
	5.	Process Industry Emission Standards
$\boxtimes$	6.	Control of Fuel Burning Equipment
$\boxtimes$	7.	Control of VOCs
$\boxtimes$	8.	Sampling, Testing, and Reporting
$\boxtimes$	9.	Visible Emissions Standards
$\boxtimes$	10.	Control of Fugitive Dust
$\boxtimes$	11.	Toxic Air Pollutants Control
	12.	Vehicle Emissions Inspections and Testing
Other	(you r	must list these if applicable)
$\boxtimes$	13.	Federal, State, tribal, or local regulations not listed above.
	14.	Local- Regulations for the Control of Atmospheric Pollution ID Numbers (specify whether State or Federal).  Construction Permit PFE-09-0301-0544-I-II-C

#### **Hazardous Waste Management Regulations**

Check all that apply.

$\boxtimes$	1.	Identification and listing of hazardous waste (40 CFR 261)
	$\boxtimes$	- Characteristic waste
	$\boxtimes$	- Listed waste
$\boxtimes$	2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
	$\boxtimes$	- Manifesting
	$\boxtimes$	- Pre-transport requirements
	$\boxtimes$	- Record keeping/reporting
	3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
		- Transfer facility requirements

		- Manifest system and record-keeping
		- Hazardous waste discharges
$\boxtimes$	4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)
	$\boxtimes$	- General facility standards
	$\boxtimes$	- Preparedness and prevention
	$\boxtimes$	- Contingency plan and emergency procedures
	$\boxtimes$	- Manifest system, record-keeping, and reporting
		- Groundwater protection
	$\boxtimes$	- Financial requirements
	$\boxtimes$	- Use and management of containers
	$\boxtimes$	- Tanks
		- Waste piles
		- Land treatment
		- Incinerators
	5.	Interim Standards for TSD Owners and Operators (40 CFR 265)
	6.	Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
$\boxtimes$	7.	Administered Permit Program (Part B) (40 CFR 270)
Other	(you	must list these if applicable)
$\boxtimes$	8.	Federal, State, tribal, or local regulations not listed above
⋈	0	Local- Regulations to Control Hazardous and Non-Hazardous Solid Wastes
	9.	ID Numbers (specify whether State or Federal). EPA ID Number PRD 090346909
Hazar	dous	Materials Management
Check	call ti	hat apply.
	1.	Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
$\boxtimes$	2.	Designation of Reportable Quantities and Notification of Hazardous Materials Spill
		(40 CFR 302)
$\boxtimes$	3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)
$\boxtimes$	4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)
$\boxtimes$	5.	Community Right-to-Know Regulations (40 CFR 350-372)
	6.	Underground Storage Tank Regulations (40 CFR 280-282)
Other	(you	must list these if applicable)
	7.	Federal, State, tribal, or local regulations not listed above.
	8.	ID Numbers (specify whether State or Federal). DOT Registration 062000-010- 0371, TRI Facility ID 00617PFZRPHIGHW
Solid	Was	te Management
Check	all tl	nat apply.
	1.	Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
	2.	Permit Requirements for Solid Waste Disposal Facilities
	3.	Installation of Systems of Refuse Disposal
	4.	Solid Waste Storage and Removal Requirements
	5.	Disposal Requirements for Special Wastes

Other (you must list these if applicable)

$\boxtimes$	6.	Federal, State, tribal, or local regulations not listed above.
		Local RequirementsNon-Hazardous Solid Waste Regulations, Control of Hazardous and
		Non-Hazardous Solid Waste Regulations
	7	ID Numbers (specify whether State or Federal)

ID Numbers (specify whether State or Federal).

Local Bio-medical Medical Waste Permit DBM-9-93-9-0031-R-97

### **Water Pollution Control Requirements**

Check	k all tha	at apply.
	1. 2.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) Designation of Hazardous Substances (40 CFR 116)
	3.	Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
	4.	NPDES Permit Requirements (40 CFR 122)
	5. 6.	Toxic Pollutant Effluent Standards (40 CFR 129)  General Pretreatment Regulations for Existing and New Sources
		(40 CFR 403)  Name of POTW Barcelonet Regional Wastewater Treatment Facility  ID # of POTW
	7.	Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
	8.	Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
	9.	Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
	10.	Water Quality Standards
	11.	Effluent Limitations for Direct Dischargers
$\boxtimes$	12.	Permit Monitoring/Reporting Requirements
	13.	Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
	14.	Collection, Handling, and Processing of Sewage Sludge
$\boxtimes$	15.	Oil Discharge Containment, Control and Cleanup
$\boxtimes$	16.	Standards Applicable to Indirect Discharges (Pretreatment)
Other	(you m	nust list these if applicable)
$\boxtimes$	17.	Federal, State, tribal, or local regulations not listed above. 40 CFR 439 & Local Pretreatment Regulations (PRASA)

### **Drinking Water Regulations**

Check all that apply.

18.

 $\boxtimes$ 

- ☑ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☑ 2. National Primary Drinking Water Standards (40 CFR 141)

ID Numbers (specify whether State or Federal).

Local PRASA Wastewater Permit GDA 92-202-038

- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☑ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other (you must list these if applicable)

 $\boxtimes$ 

8.

7. Federal, State, tribal, or local regulations not listed above. non-community, non-transient water system

ID Numbers (specify whether State or Federal).

UIC Permit UIC-84-0208, Local Water Extraction Permit RO-11-0800-FL-70255

		UIC Permit UIC-84-0208, Local Water Extraction Permit RO-11-0800-FL-70255
Toxic	Subs	stances
Checi	k all th	at apply.
	1.	Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
	2.	Import and Export of Chemicals (40 CFR 707)
	3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)
	4.	Chemical Information Rules (40 CFR 712)
	5.	Health and Safety Data Reporting (40 CFR 716)
	6.	Pre-Manufacture Notifications (40 CFR 720)
	7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)
	8.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
	9.	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
Other	you l	must list these if applicable)
	10.	Federal, State, tribal, or local regulations not listed above.
	11.	ID Numbers (specify whether State or Federal).
Pesti	cide F	Regulations
Chec	k all th	at apply.
	1.	FIFRA Pesticide Use Classification (40 CFR 162)
	2.	Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
	3.	Certification of Pesticide Applications (40 CFR 171)
	4.	Pesticide Licensing Requirements
	5.	Labeling of Pesticides
	6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements
	7.	Disposal of Pesticide Containers
	8.	Restricted Use and Prohibited Pesticides
Other	you i	must list these if applicable)
	9.	Federal, State, tribal, or local regulations not listed above.
	10.	ID Numbers (specify whether State or Federal).
Envir	onme	ntal Clean-Up, Restoration, Corrective Action
	1.	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). Please identify and include date of Record of Decision.
$\boxtimes$	2.	RCRA Corrective Action. Please provide date of RCRA/HSWA permits that require corrective action.

RCRA Part B Permit dated 1/30/1990

3. Other Federal, State, tribal, or local er

3. Other Federal, State, tribal, or local environmental clean-up, restoration, corrective action regulations not listed above. Please include date of requirement.

Facility Name PPLLC Barceloneta Facility
Facility Location: Pull Barceloneta, Puerto Rico

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1888-339-PTRK (7875) or email ptrack@indecon.com.

To submit your application:

- 1) E-mail the completed application to ptrack@indecon.com, and
- 2) Fax the completed an signed Section E (**not** the entire application) to (617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

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